

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HAT TRICK MARINE, LLC, LLC,
FEDERAL INSURANCE COMPANY, and
ACE AMERICAN INSURANCE
COMPANY,

Plaintiffs,

v.

COREY TOEDEBUSCH, SARAH BOND, and the
marital community thereof,

Defendants.

COREY TOEDEBUSCH, SARA BOND,
and the marital community thereof,

Third-Party Plaintiffs,

vs.

PHILIP CORBIN III, an individual,

Third-Party Defendant.

IN ADMIRALTY

CAUSE NO. 2:20-CV-01697 RSM

STIPULATED MOTION AND
ORDER EXTENDING
DISCOVERY DEADLINE

NOTING DATE: SEPTEMBER 22,
2021

Pursuant to LCR 7(j), the parties, by and through their counsel of record, move this Court for relief from the discovery deadline to allow the completion of the depositions of defendant Sarah Bond, defense/third-party plaintiff expert Gerard Schaefer, and third-party defendant Philip Corbin III.

ATTORNEYS AT LAW

STIPULATED MOTION AND ORDER
EXTENDING DISCOVERY DEADLINE - 1

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No.: 2:20-CV-01697

BAUER MOYNIHAN & JOHNSON LLP
2101 FOURTH AVENUE, STE. 2400
SEATTLE, WASHINGTON 98121
TELEPHONE: (206) 443-3400

Motion to Extend Discovery Deadline

The parties to this matter have been diligently pursuing discovery including the exchange of written discovery and expert reports. The parties have taken the depositions of seven designated witnesses. In addition to the discovery to date, the parties have been working to arrange the depositions of three additional individuals, defendant Sarah Bond, defense/third-party plaintiffs' expert Gerard Schaefer, and third-party defendant Philip Corbin. Due to conflicts in attorney and witness work schedules including a recent unanticipated interruption caused by an attorney being called into trial, the depositions of Bond, Schaefer, and Corbin will not be able to be completed by the October 4, 2021 discovery deadline. The parties and witnesses have agreed that the depositions of Bond and Schaefer can occur on October 7, 2021 and the deposition of Corbin can occur on October 12, 2021.

Good cause exists for relief from the discovery deadline to allow completion of the depositions. The parties have been working diligently to arrange the depositions and the inability to complete the discovery is not due to any individual fault but to the complexities of accommodating the schedules of attorneys and witnesses. Extension of the discovery deadline is requested solely to complete the depositions of the aforementioned individuals, which the parties agree have discoverable and relevant information related to their claims and defenses. Therefore, the parties respectfully request this Court grant relief from the discovery deadline for the purposes of holding the depositions Sarah Bond, Gerard Schaefer, and Philip Corbin III.

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ATTORNEYS AT LAW

1 Dated this 22nd day of September, 2021.

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3 BAUER MOYNIHAN & JOHNSON LLP

4 /s Joseph M. Browne

5 Joseph M. Browne, WSBA No. 36580

6 /s Meliha Jusupovic

7 Meliha Jusupovic, WSBA No. 54024

8 Bauer Moynihan & Johnson LLP

9 2101 Fourth Avenue Suite 2400

10 Seattle, WA 98121

11 Telephone: (206) 443-3400

12 Fax: (206) 448-9076

13 jmbrowne@bmjlaw.com

14 mjusupovic@bmjlaw.com

15 Attorneys for Plaintiffs and Third-Party
16 Defendant

17 WIECK WILSON, PLLC

18 s/ Coreen Wilson

19 Coreen Wilson, WSBA No. 30314

20 Wieck Wilson, PLLC

21 400 112th Avenue NE, Suite 340

22 Bellevue, WA 98004

23 Telephone: (425) 454-4455

24 Fax: (425) 454-4457

25 coreenw@wieckwilson.com

26 Attorney for Defendants and Third-Party
27 Plaintiffs

SHUMSKY & BACKMAN

s/ Brent Hardy

Brent Hardy, WSBA No. 45405

Shumsky & Backman

219 NW 20th Avenue, Suite 201

Battle Ground, WA 98604

Telephone: (360) 891-0442

Fax: (360) 891-0110

brent@shumsky-backman.com

Attorney for Third-Party Plaintiffs and Third-
Party Plaintiffs

ATTORNEYS AT LAW

STIPULATED MOTION AND ORDER
EXTENDING DISCOVERY DEADLINE - 3

No.: 2:20-CV-01697

BAUER MOYNIHAN & JOHNSON LLP
2101 FOURTH AVENUE, STE. 2400
SEATTLE, WASHINGTON 98121
TELEPHONE: (206) 443-3400

ORDER

It is so ordered.

DATED this 24th day of September, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE